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*FUTURE MOTION, INC.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

FUTURE MOTION, INC.,

Plaintiff,

v.

TONY LAI, an individual doing business  
as FLOATWHEEL,

Defendant.

Case No. 3:23-cv-01742-AR

**DECLARATION OF SHAWN J.  
KOLITCH IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION  
AGAINST NONPARTY GOOGLE  
LLC, D/B/A YOUTUBE**

I, Shawn J. Kolitch, hereby declare as follows:

1. I am lead counsel in this action. I am a member in good standing of the Oregon Bar and the Federal District Court for the District of Oregon.
2. On March 14, 2025, I visited Defendant's YouTube channel at [youtube.com/floatwheel](https://youtube.com/floatwheel) using a number of different methods. These methods included (i) turning on the VPN software used by my law firm, selecting an IP address outside the

United States, and navigating directly to the URL [youtube.com/floatwheel](https://youtube.com/floatwheel); and (ii) turning off the VPN, and then navigating to the channel through each of the following international YouTube mirror site URLs:

- (a) [youtube.ru/floatwheel](https://youtube.ru/floatwheel)
- (b) [youtube.jp/floatwheel](https://youtube.jp/floatwheel)
- (c) [youtube.es/floatwheel](https://youtube.es/floatwheel)
- (d) [youtube.fr/floatwheel](https://youtube.fr/floatwheel)
- (e) [youtube.ie/floatwheel](https://youtube.ie/floatwheel)
- (f) [youtube.it/floatwheel](https://youtube.it/floatwheel)
- (g) [youtube.nl/floatwheel](https://youtube.nl/floatwheel)
- (h) [youtube.pl/floatwheel](https://youtube.pl/floatwheel)

I observed that each of these methods provided immediate access to Defendant's entire YouTube channel, including all videos and other content.

3. It appears to me that the YouTube international URLs listed above simply redirect to [youtube.com/floatwheel](https://youtube.com/floatwheel), but without the need to use a VPN. In other words, Defendant's YouTube channel can be immediately accessed, without a VPN, simply by replacing ".com" in the original URL with any of the other suffixes ".ru", ".jp", ".es", ".fr", ".ie", ".it", ".nl", or ".pl".

4. Upon navigating to Defendant's YouTube channel on March 14, 2025 using any of the above methods, I observed that all 48 of Defendant's videos the Court has ordered Defendant to take down remain available, plus an additional 19 videos advertising Defendant's infringing products and inducing infringement of Future

Motion's patents. Attached as Exhibit A to my declaration are true and correct screenshots I took of the "Videos" and "Shorts" portions of Defendant's YouTube channel, listing these 67 videos with thumbnail images.

5. While visiting Defendant's YouTube channel on March 14, 2025, I viewed Defendant's two most recently published videos and determined that they were published on March 2, 2025 and March 3, 2025, respectively. Attached as Exhibit B to my declaration are true and correct screenshots I took of these individual video pages, with the publication dates highlighted.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. DATED: March 18, 2025.



Shawn J. Kolitch